

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

No. 14-00029-AB

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**MOTION FOR LEAVE TO FILE SUR-REPLY IN OPPOSITION TO CO-LEAD
CLASS COUNSEL'S MOTION TO COMPEL CASE STRATEGIES GROUP, IT
STRATEGIES GROUP, CRAIG SIENEMA, JAMES MCCABE, LIBERTY
SETTLEMENT SOLUTIONS, LLC, LIBERTY CONTINGENT RECEIVABLES, LLC,
LIBERTY SETTLEMENT FUNDING, JMMHCS HOLDINGS, LLC, AND MARC
HERMES TO RESPOND TO IMPROPER NONPARTY DISCOVERY**

Nonparties Case Strategies Group ("CSG"), IT Strategies Group, Liberty Settlement Solutions, LLC, Liberty Contingent Receivables, LLC, Liberty Settlement Funding, JMMHCS Holdings, LLC, Craig Sienema, James McCabe, and Marc Hermes, (collectively

“Respondents”), hereby move this Court for leave to file a Sur-Reply in Opposition to Class Counsel’s Motion to Compel (the “Sur-Reply”), attached hereto as Exhibit “A.”

The attached Sur-Reply is necessary for the limited purpose of correcting several misstatements within Class Counsel’s Reply in Support of its Motion to Compel also filed on September 5, 2017. Respondent’s Sur-Reply is limited to this purpose.

Accordingly, for the reasons more fully set forth in Respondent’s Opposition to the Motion to Compel [ECF No. 8348], as well as in the attached Sur-Reply, the Court should deny Class Counsel’s Motion to Compel and impose appropriate sanctions on Class Counsel.

Respectfully submitted,

Dated: September 5, 2017

By: /s/ Richard L. Scheff

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing Motion for Leave to File Sur-Reply to Class Counsel's Motion to Compel was served on all counsel of record via the Court's ECF System on September 5, 2017.

/s/ Richard L. Scheff
Richard L. Scheff